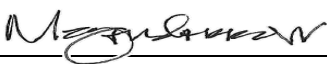




Industrial Waste Program Report Certification Statement

Exhibit No. 28

Date: December 16, 2019	Permit/Authorization number: 7595-06
Company/Agency name: Republic Services - Rabanco Recycling Facility	
Sample site number: A43406	
Type of report attached: (Choose one or indicate report next to "other") <input type="checkbox"/> 14-Day Report: Discharge or permit violation (Permit, Section S4 or Discharge Authorization, General Condition D) <input type="checkbox"/> 5-Day Report: Slug discharge or spill (Permit, Section S6) <input checked="" type="checkbox"/> Slug/Spill Control Plan (Permit, Section S6) <input type="checkbox"/> Best Management Practices (BMPs) Compliance Report (Permit, Section S3) <input type="checkbox"/> Installation/Upgrade of Pretreatment System Report (Permit, Section S6) <input type="checkbox"/> 90-Day Compliance Report (Permit, Section S11) <input type="checkbox"/> Pretreatment System Operation and Maintenance (O&M) Manual (As required) <input type="checkbox"/> Other:	
<i>I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</i>	
Signature: 	
Name: Megan Darrow	
Date: December 16, 2019	
Title: Environmental Specialist	
Person signing above is: (choose one) <input type="checkbox"/> Authorized Representative <input checked="" type="checkbox"/> Delegated Authorized Representative*	
<small>*All user reports must be signed by an authorized representative of the industrial user. "Authorized representative of industrial user" is defined by King County Code 28.82.050. If you are delegated, a current Delegation of Signatory Authority must be on file at King County or completed and attached to this form.</small>	

Please return this form and attachments to:

King County Industrial Waste Program
201 S. Jackson Street, Suite 513, Seattle, WA 98104-3855
Fax: 206-263-3001
Email: info.KCIW@kingcounty.gov

RAB001520

**RABANCO RECYCLING AND WASTE
REDUCTION CENTER
SLUG CONTROL PLAN**

2733 Third Avenue South
Seattle, WA

Updated December 16, 2019
KC Permit No. 7595-06

Rabanco Recycling Center
 Slug Control Plan
 12/16/19

1.0 PURPOSE.....	3
2.0 BACKGROUND	3
2.1 HOURS OF OPERATION	3
2.2 FACILITY ACCESS; CONTROL OF PUBLIC ACCESS	4
3.0 SITE DESCRIPTION.....	4
3.1 GENERAL RECYCLABLES	4
3.2 CONSTRUCTION, DEMOLITION & LANDCLEARING DEBRIS	4
3.3 SPECIAL WASTES	4
3.4 E-WASTE	4
3.5 OTHER	5
4.0 NEW AND WASTE CHEMICALS	5
5.0 DISCHARGE PRACTICES	5
6.0 SPILL NOTIFICATION PROCEDURE.....	5
7.0 TRAINING / O&M.....	6
SCHEDULE 1 CONTACTS	7
APPENDIX.....	8
NEW AND WASTE CHEMICALS	9
POTW SLUG EVENT NOTIFICATION FORM	10
FACILITY LAYOUT	13

Rabanco Recycling Center
Slug Control Plan
12/16/19

RABANCO RECYCLING AND WASTE REDUCTION CENTER SLUG CONTROL PLAN

1.0 PURPOSE

The purpose of this plan is to provide detailed instructions for slug discharge to the publicly owned treatment works (POTW) prevention and control

2.0 BACKGROUND

Numerous solid waste handling operations occur at the Rabanco Recycling and Waste Reduction Center ("Recycling Center", or "Center") located at 2733 Third Avenue South, Seattle, Washington.

Operations of the Rabanco Recycling Center begin off-site during the collection phase. To maximize the efficiency of the Center from both a recycling and an environmental health standpoint, collection routes are planned by waste types. The waste types delivered to the Center are categorized as: Pre-sorted (residential) Recyclables; Commercial Recyclables (generally mixed but dry solid wastes); and Other Solid Wastes (contaminated soils). Asbestos wastes are handled at this facility in accordance with the Asbestos Waste Management Plan, which is an element of the Special Wastes Section.

Waste is handled in different buildings at the Center. The Pre-sorted Recyclables and Commercial Recyclables are handled in Buildings 1 & 2. Special Wastes (petroleum contaminated soils and asbestos) are handled in areas adjacent to the one of the Transportation yards. Some of the waste (petroleum contaminated soils, other wastes) arrive at the facility already containerized; these containerized wastes are loaded directly onto rail cars without any additional handling.

2.1 Hours of Operation

The Hours during which waste is accepted at this facility are as follows:

Monday-Friday	24 Hours per day
---------------	------------------

Rabanco Recycling Center
Slug Control Plan
12/16/19

Closed only for cash customers –Saturday at 4:00 P.M. until Monday at 7:00 am
Holidays (When Closed) Thanksgiving, Christmas

2.2 Facility Access; Control of Public Access

A sign is posted at the entrance to the facility, which shows the name of the facility, hours of operation, hours the facility is open to the general public, and lists the types of materials accepted at the facility.

The main entrance to the facility will be monitored at all times, the facility is open by scale house personnel and traffic control monitors. The back entrance is monitored by equipment operators and traffic control monitors. This will prevent unauthorized vehicle traffic on-site, protect the public, and prevent illegal dumping and scavenging at the facility.

3.0 SITE DESCRIPTION

The site is composed of several contiguous lots encompassing approximately 13 acres. The site plan delineates the location of buildings and identifies the location of specific activities. The site plan is included in the appendix.

3.1 General Recyclables

Building 1 is a 75,000 square foot converted warehouse and manufacturing building, completely enclosed on three sides. The south side of the building has some partial closures, and open bays to allow for movement of equipment. Several pieces of equipment used in the separation of recyclables and preparation of same for transport are located within the building.

3.2 Commercial Recyclables

Commercial recycling is handled inside of Building 2. The portion of the site between Building 1 and Building 2 include vehicle maneuvering and queuing areas, and maintenance areas.

3.3 Special Wastes

The southern portion of the site includes handling areas for asbestos, petroleum contaminated soils, pre-containerized wastes, and rail loading areas.

3.4 E-Waste

Rabanco Recycling Center
Slug Control Plan
12/16/19

Electronic waste is received at the site and is designated for recycling. The recycling is accomplished by a third party contractor.

3.5 Other

The western part of the site includes lands owned and leased by Rabanco and is primarily railroad track storage and operating areas. Other site buildings include a scale house, offices, and storage areas.

4.0 NEW AND WASTE CHEMICALS

Petroleum products and chemicals are used onsite for the operation and maintenance of the equipment used in the waste collection and transfer process. An inventory of the petroleum products and chemicals (in quantities greater than 55gal) are included in the appendix along with the method of storage and location. The largest volume of petroleum products is the diesel tank for the the filling of RDC's equipment. The tank volume is 20,000gal and has secondary containment equaling 110% of the primary tank volume.

5.0 DISCHARGE PRACTICES

Wastewater is discharged to the POTW via the sanitary sewer system. All process water and incident rainwater are gravity fed to the sewer system. The exceptions are the process water (wash down water) and leachate (water squeezed out during compaction operations) generated in the North building. These wastewater sources are gravity fed to one lift station on the West end of the site, where it is pumped to the sanitary sewer system.

6.0 SPILL NOTIFICATION PROCEDURE

Spills are documented and appropriate agencies are notified in accordance with the 3rd and Lander SPCC plan. King County Wastewater Treatment Division will be notified if the spill creates a slug discharge to the POTW. Notification (via phone 206.263.3801) will include:

1. Date & Time
2. Personnel involved
3. Type of material causing the slug discharge
4. Approximate volume of spill that reached the sewer system
5. Method of response

Rabanco Recycling Center
Slug Control Plan
12/16/19

This notification will be as immediate as possible after providing security for the health and safety of the employees in the immediate area.

Follow-up written notification will include all of the above data and:

6. Appropriateness of response
7. Factors contributing to spill
8. Methods used to prevent future occurrences

Written notification will be sent to:

King County Wastewater Treatment Division
Attn: Slug Discharge Reporting, Industrial Waste
201 S. Jackson Street, Suite 500
Seattle, WA 98104

7.0 TRAINING / O&M

Training and operation and maintenance of pollution control equipment related to the potential to create a slug discharge to the POTW is included in the 3rd and Lander SPCC plan and its' implementation. A copy of the plan is included under a separate cover. Special emphasis on the potential to emit slugs to the POTW will be included in the SPCC training.

Rabanco Recycling Center
Slug Control Plan
12/16/19

SPILL CONTACTS

Emergency/24 hr Contact Numbers

Don Zimmerman, Site Manager
206-652-8805 (office)
(b) (6) (cell)

Jeff Nguyen, Division Manager
(b) (6) (cell)

Spill Response Contact Numbers

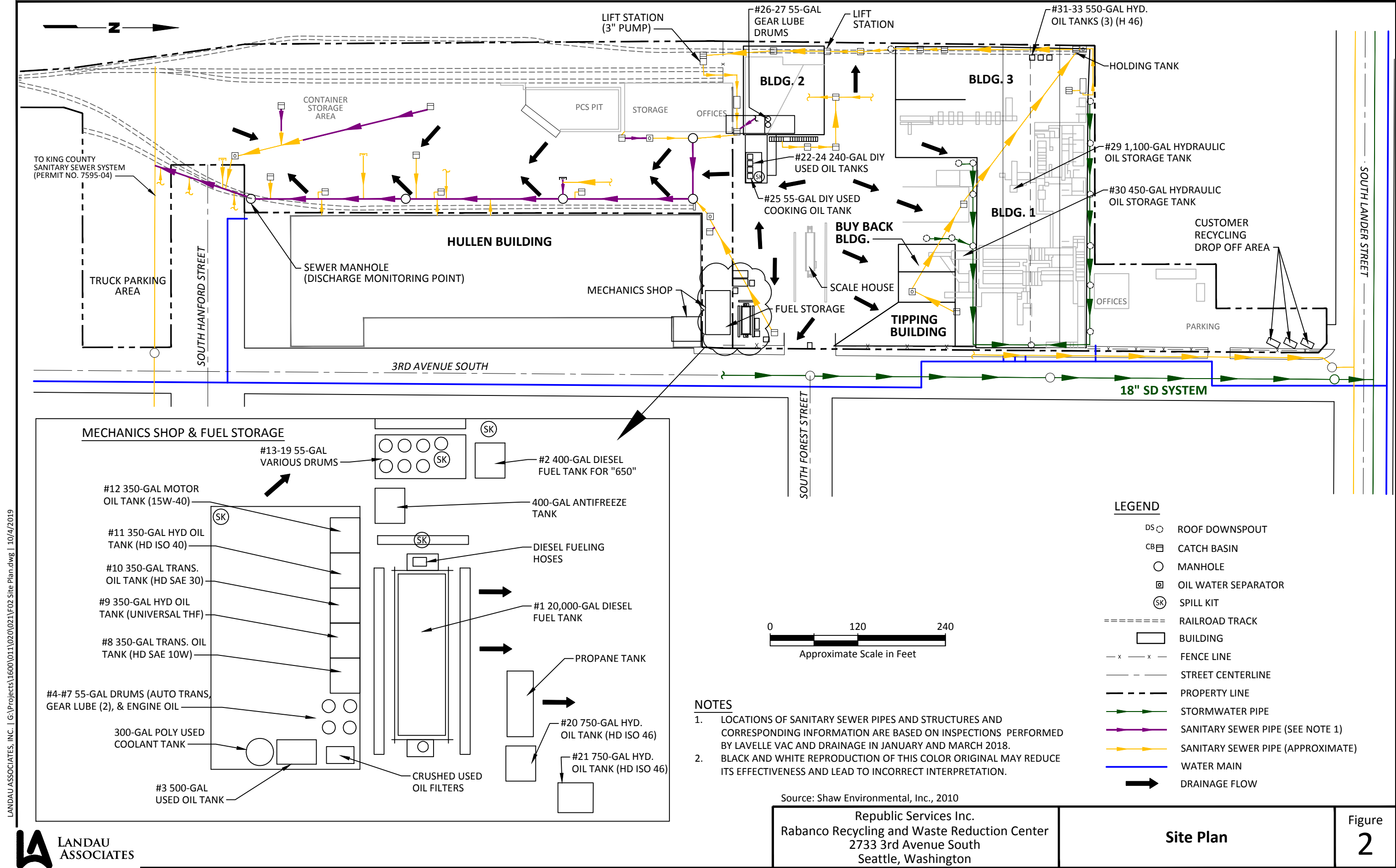
Megan Darrow, Environmental Specialist
(b) (6) (cell)

Phirun Lach, Site Supervisor
206-336-1401 (office)

Rabanco Recycling Center
Slug Control Plan
12/16/19

APPENDIX

New and Waste Chemical Inventory and Location Form
Site Diagrams
3rd and Lander SPCC Plan (under separate cover)



LANDAU ASSOCIATES, INC. | G:\Projects\1600\011\020\021\F02 Site Plan.dwg | 10/4/2019



Appendix B

Spill Response Procedures

If there is an immediate threat to human life (e.g., a fire in progress or fumes overcoming workers), make an announcement to evacuate the building and call 911.

EMERGENCY RESPONSE GOAL: An effective response procedure during an oil or substance release incident is to keep the material separated from water to minimize migration and the resulting potential increase in human and environmental exposure.

EMERGENCY CONTACTS:

- A. SPCC COORDINATOR
Don Zimmerman
(206) 336-1405
- B. ASSISTANT SPCC COORDINATOR
Phirun Lach
(206) 336-1401
- C. WA ENVIRONMENTAL MANAGER
Art Mains
(541) 288-6858
- D. NRC ENVIRONMENTAL
For spill cleanup
(800) 337-7455
- E. SEATTLE FIRE DEPARTMENT
(206) 684-7274 or **911**
- F. PROVIDENCE MEDICAL CENTER
500 17th Avenue – Seattle, Washington
(206) 320-2500 or **911**
- G. NATIONAL RESPONSE CENTER (US Coast Guard)
(800) 424-8802
- H. WASHINGTON EMERGENCY MANAGEMENT DIVISION
(800) 258-5990 or (800) OILS-911
- I. WASHINGTON STATE DEPARTMENT OF ECOLOGY NORTHWEST REGION
(425) 553-1263
- J. US ENVIRONMENTAL PROTECTION AGENCY, REGION 10
(206) 553-1263

Appendix H Inspection Record Form

1. TIME PROBLEM DISCOVERED: _____ DATE: _____
2. TIME PROBLEM STOPPED: _____ DATE: _____
3. APPROXIMATE LOCATION AND TYPE OF ACCIDENT (e.g., FIRE, EXPLOSION, SPILL): _____

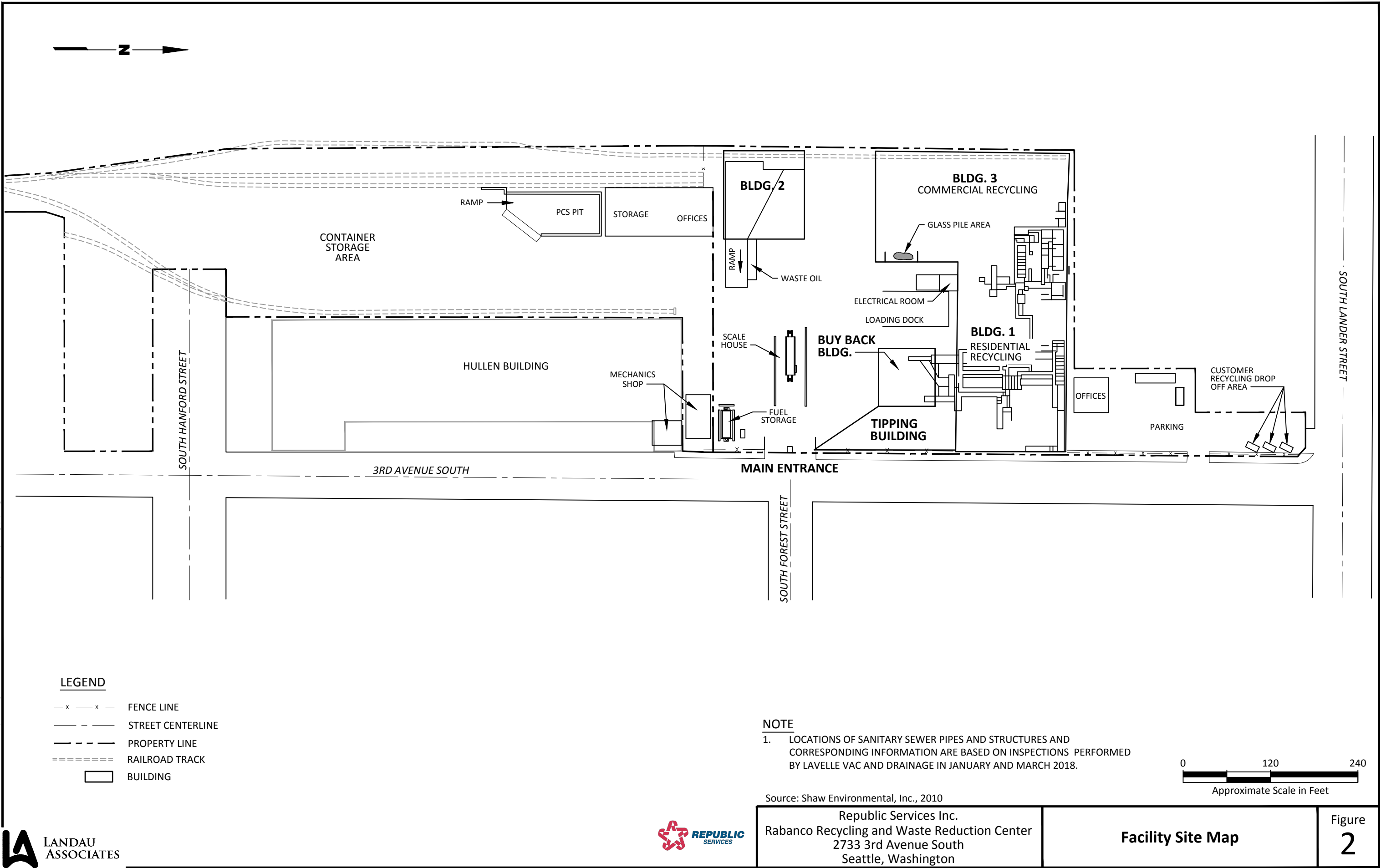
4. MATERIAL SPILLED: _____
5. APPROXIMATE VOLUME SPILLED: _____
6. WHAT DAMAGE TO PEOPLE OR THE ENVIRONMENT IS LIKELY? _____

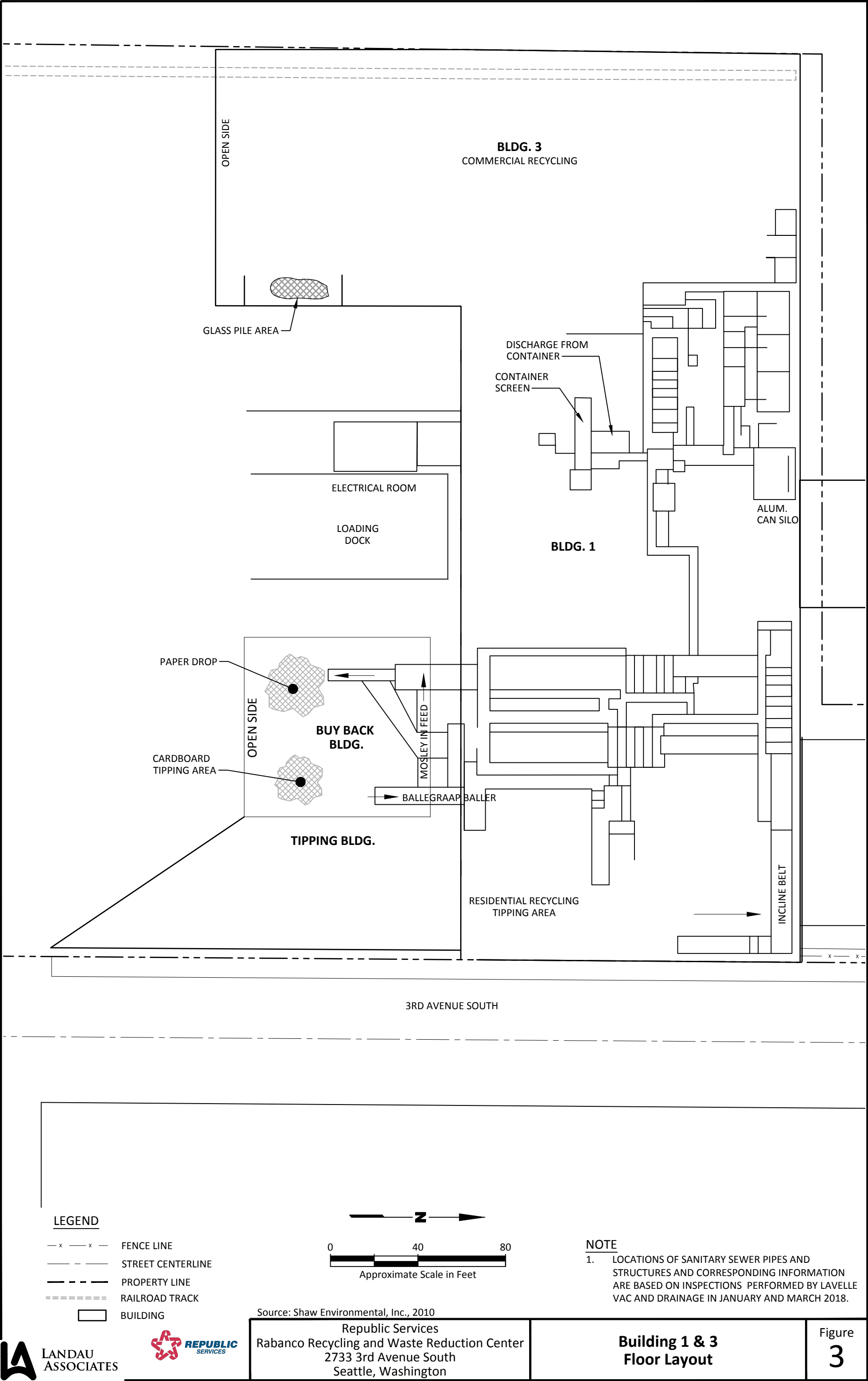
7. ESTIMATED AMOUNT OF MATERIAL RECOVERED: _____
8. HOW WAS THE RECOVERED MATERIAL DISPOSED OF? _____
9. ACTION TAKEN TO CONTROL THE PROBLEM AND PREVENT FURTHER PROBLEMS: _____

SIGNATURE (SPCC COORDINATOR): _____ DATE: _____

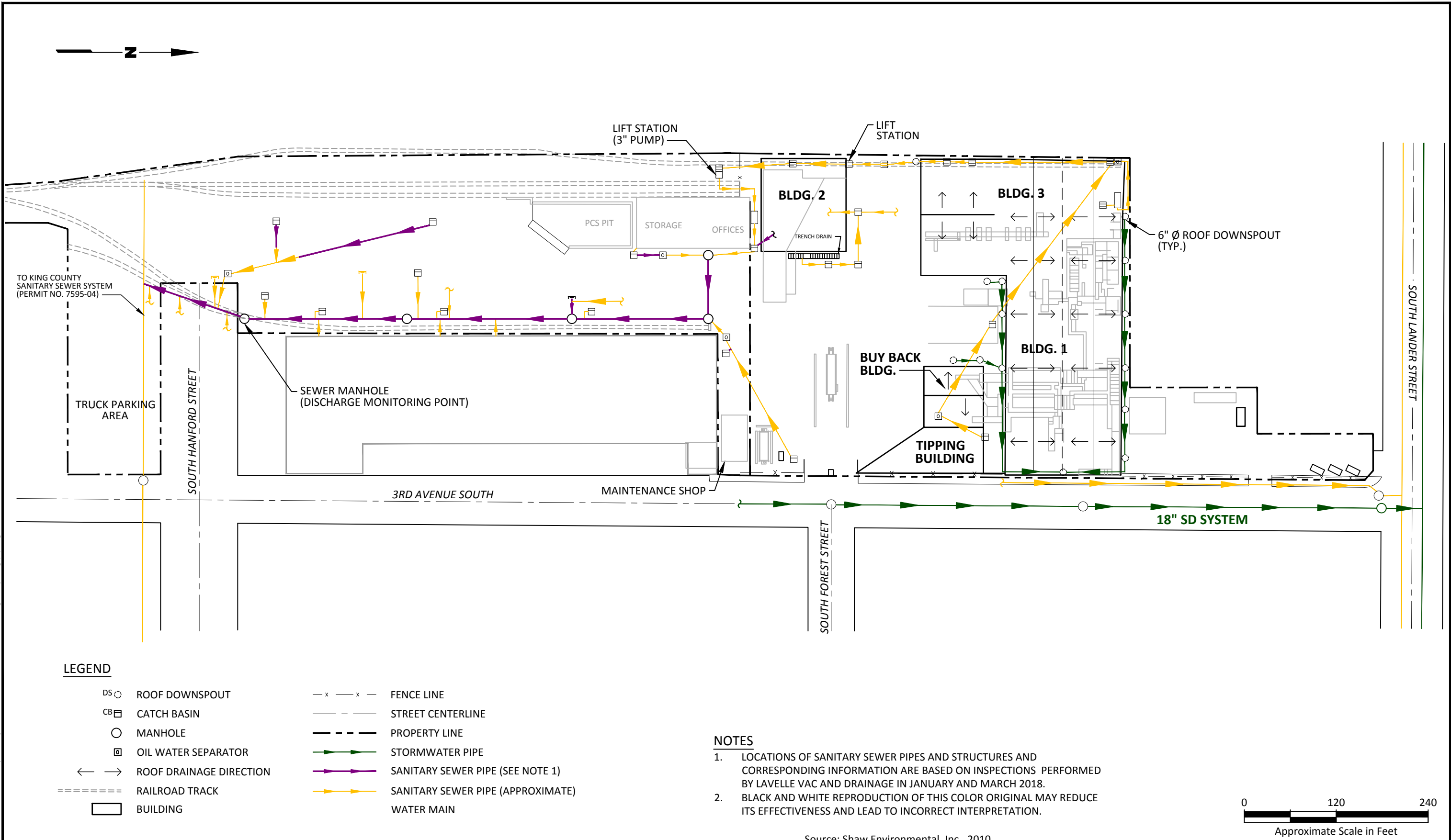
Written notification within 5 days of the event will be submitted to: King County Industrial Waste Program, 201 South Jackson Street, Suite 500, Seattle WA 98104. info.kciw@kingcounty.gov

LANDAU ASSOCIATES, INC. | G:\Projects\1600\017\010\011\F02 Facility Site Map.dwg (A) "Fig 2" 7/10/2019





LANDAU ASSOCIATES, INC. | G:\Projects\1600\017\010\011\F04 Drainage Map.dwg (A) "Figure 4" 7/18/2019

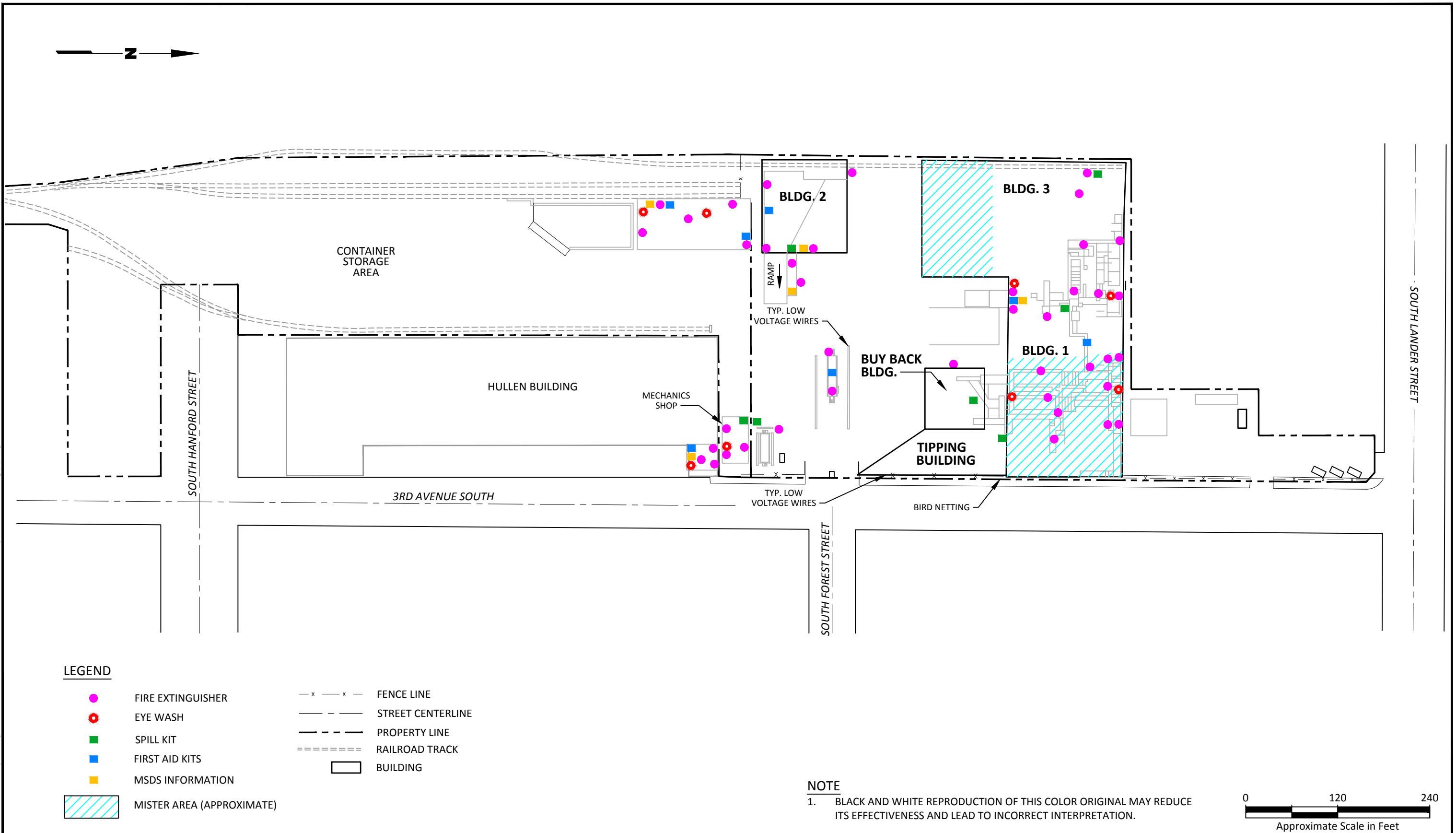


Republic Services Inc.
Rabanco Recycling and Waste Reduction Center
2733 3rd Avenue South
Seattle, Washington

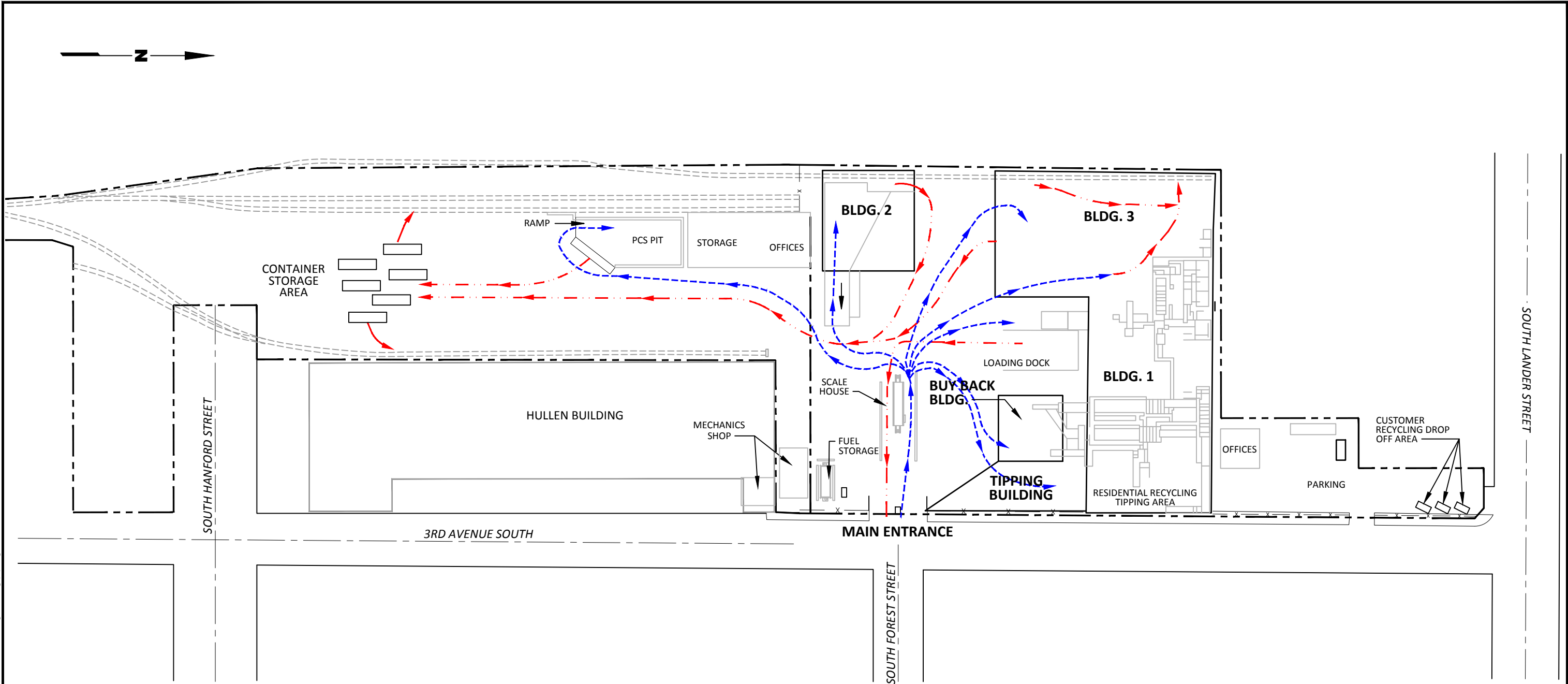
Drainage Map

Figure
4




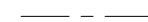



LANDAU ASSOCIATES, INC. | G:\Projects\1600\017\010\011\F05 Dust Control & Site Safety Features Plan.dwg (A) "Figure 5" 7/18/2019



LANDAU ASSOCIATES, INC. | G:\Projects\1600\017\010\011\F06 Traffic Flow Diagram.dwg (A) "Figure 6" 7/18/2019



LEGEND

-  TRAFFIC AND WASTE STREAM INFLOW PATH
-  TRAFFIC AND WASTE STREAM OUTFLOW PATH
-  FENCE LINE
-  STREET CENTERLINE
-  PROPERTY LINE
-  RAILROAD TRACK
-  BUILDING

NOTE

1. BLACK AND WHITE REPRODUCTION OF THIS COLOR ORIGINAL MAY REDUCE ITS EFFECTIVENESS AND LEAD TO INCORRECT INTERPRETATION.

Source: Shaw Environmental, Inc., 2010

